

## CITY OF CLAREMONT

City Hall  
207 Harvard Avenue  
P.O. Box 880  
Claremont, CA 91711-0880  
FAX (909) 399-5492

City Council • (909) 399-5444

*Paul Held*  
*Algird Leiga*  
*Diann Ring*  
*Karen Rosenthal*  
*Suzan Smith*

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June 30, 1998

Rick Breitenbach  
CALFED Bay-Delta Program  
1416 Ninth Street, Suite 1155  
Sacramento, CA 95814

Dear Sir:

### Comments on Draft Programmatic EIS/EIR

The City of Claremont is very interested in the public hearings on the Draft EIS/EIR. On behalf of the Claremont City Council, I respectfully submit the following comments on the Draft EIS/EIR for your serious consideration in the selection of a Preferred Alternative and the refinement of the Draft EIS/EIR:

- 1. Some Action Must Be Taken** - The City of Claremont fully agrees with the approach of the state and federal government agencies in forming CALFED. While only included in the EIS/EIR as a baseline against which other actions may be measured, it is important to note that "no action" must be considered an unacceptable outcome. As a concerned community regarding the Bay-Delta situation, Claremont considers the CALFED Program and its successful long-term implementation as the best hope to stem the continuing decline in all four problem areas: the ecosystem, water quality, water supply, and levee/system integrity.
- 2. Impact of Problem Areas for Claremont's Residents/Water Suppliers** - All four of the problem areas touch on Claremont in some way, underscoring the nature of the problems as highly interrelated. As a community who uses water through a wholesale water provider dependent upon water exported from the Delta, Claremont is directly affected by restrictions on the water supply to the State Water Project (SWP). The Three Valleys Municipal Water District's 25-mgd Miramar Water Treatment Plant, which serves the potable water needs of our community, relies on 100 percent of its supply on the State Water Project.

Water quality presents a problem even more pressing in some ways than the water supply issue. The problems associated with bromide and TOC in Delta export water cannot be ignored. Drinking water quality regulations are being tightened to gain better control of disinfection by-products, such as trihalomethanes and other suspected carcinogens that may also contribute to serious health effects. These disinfection by-products may be impossible to control sufficiently through treatment methods (which are also very expensive). Therefore, it is extremely important for the CALFED Program to control and reduce the level of bromide and TOC at the export pumps for the SWP. Other contaminants – heavy metals, pesticides, and so on – present a lesser problem at this time, but control of all water quality degradation must remain a key focus of the Program.

Levee integrity and ecosystem restoration are also very important issues to resolve, because of the indirect affect these problems have on water supply and water quality. Claremont, along with other San Gabriel Valley agencies, accepts and supports the solution principle that all four problems must be addressed concurrently, and that for a comprehensive solution to be acceptable, it must not redirect impacts from one problem to another or from one stakeholder group to another.

3. **Water Use Efficiency** – Claremont supports water use efficiency for both agricultural and urban sectors as a part of the CALFED Program. However, the estimated urban real water savings for the South Coast urban region is substantially different from estimates made by the Metropolitan Water District of Southern California in its integrated resources planning process of a few years ago. Claremont recommends that CALFED adjust the planning assumptions and savings estimates for the South Coast urban region, consistent with the IRP water conservation savings targets of MWD, which were based on full implementation of Best Management Practices. At a minimum, the EIS/EIR should explain the significant difference between these estimates.

In other words, the Water Use Efficiency Component is inadequate in describing the measures that will actually result in the additional real water savings assumed for the CALFED Program. The additional measures CALFED contemplates to achieve its assumed results appear to come down to a single sentence (Tech. Appendix p. 5-8): "CALFED has proposed that their council certify water supplier compliance with terms of the MOU."

4. **Water Supply** - The extreme fluctuation in water flows of the rivers tributary to the Delta create a very powerful "time-value" of water. This has been demonstrated very tangibly in the on-again, off-again restrictions placed on pumping, as a way to reduce fish entrainment and mortality. The crucial point of this effect is that for a long-term program to succeed, operational flexibility must be built in.


Claremont believes that maintaining current deliveries to the Metropolitan Water District should be sufficient to meet near and medium-term needs identified in its Integrated Resources Plan. However, some increase in the SWP supplies is likely going to be needed to meet long-term future demands, and that should be one goal against which the long-term success of the CALFED Program is measured.

5. **Water Quality** - As in the case of water supply, operational flexibility will be enormously important to achieving better water quality for all purposes. As CALFED moves to determine a Recommended Alternative on conveyance, it is especially important to recognize the superior benefits that would result from a dual system (Alternative 3).

6. **Alternatives** - CALFED's analysis shows that on several very important issues, a dual conveyance system would have better results than Alternative 2, and far better than Alternative 1. In fact, it is not an overstatement to recommend that Alternative 1 be rejected as inadequate to meet the stated goals and objectives of the CALFED Program. In terms of fisheries, water quality (especially on the important issue of bromide levels), Delta flow circulation, water supply, and operational flexibility, the Draft EIS/EIR ascribes greater benefits to Alternative 3 than to either of the other alternatives. Clearly, there are differences in the specific benefits from each specific option within the Alternative 3 "cluster"; however, as a general observation it appears that these would meet the CALFED solution objectives best.
7. **Assurances and Implementation** - Claremont does not make a specific recommendation for CALFED to select any particular "Preferred Alternative" because the very difficult issue of assurances remains to be resolved. Claremont would like a firm basis to know that benefits will occur as projected, that operational controls are in place, and that costs will be allocated fairly throughout the long-term course of implementation. These elements are essential for everyone – no matter what their specific interests – to gain the necessary confidence and trust to move forward with any concrete program of actions, given these actions will be costly and could have the potential to redirect negative consequences.

It is important to realize that while Claremont is not a water district, nor a water purveyor, we are a community deeply impacted by what happens with the Draft EIS/EIR and want CALFED's solutions to be in the best interest of all parties. We hope you take our comments seriously and incorporate them into the final document.

Sincerely,



Suzan Smith  
Mayor

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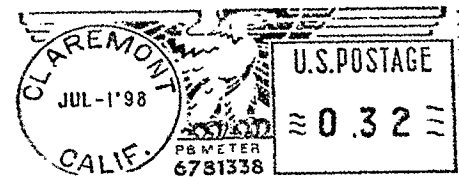
- c: Muriel O'Brien, Director-Region III, Three Valleys Municipal Water District  
Jim Gallagher, Vice President, Southern California Water Company  
Scott Miller, Assistant to the City Manager



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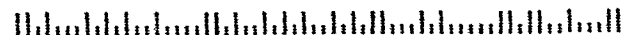
City Hall  
P.O. Box 880  
Claremont, CA 91711-0880

RICK BREITENBACH  
CALFED BAY-DELTA PROGRAM  
1416 NINTH STREET #1155  
SACRAMENTO CA 95814



DEPARTMENT OF  
WATER RESOURCES  
SACRAMENTO  
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